

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

PARAGON COMPONENT SYTEMS, LLC,

Plaintiff,

v.

Case No. 25-CV-170

QUALTIM, INC., et al.,

Defendants.

**DECLARATION OF ERIN E. STEELMAN IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL**

1. I am an attorney with the law firm of Miller & Martin PLLC and am one of the attorneys of record representing Plaintiff Paragon Component Systems, LLC ("Paragon") in the above-captioned matter. I make this declaration in support of Paragon's Motion to Compel.

2. Pursuant to Federal Rule of Civil Procedure 37(a)(1), I certify that I have in good faith conferred with Defendants in an effort to obtain the discovery that is the subject of this motion without court action.

3. Attached hereto as Exhibit A is a true and correct copy of a letter from Attorney Erin Steelman to Attorney Mayville La Rosa dated April 22, 2025

4. Attached hereto as Exhibit B is a true and correct copy of a letter from Attorney Erin Steelman to Attorney Mayville La Rosa dated June 23, 2025.

5. Attached hereto as Exhibit C is a true and correct copy of an email from Attorney Erin Steelman to Attorneys Mayville La Rosa and Michael Bradford dated July 11, 2025.

6. Attached hereto as Exhibit D is a true and correct copy of Paragon's First Set of Interrogatories to Defendants dated December 3, 2024.

7. Attached hereto as Exhibit E is a true and correct copy of Defendants' Answer to Plaintiff's First Set of Interrogatories dated January 10, 2025.

8. Attached hereto as Exhibit F is a true and correct copy of Defendants' Supplemental Answers to Plaintiff's First Set of Interrogatories dated May 14, 2025.

9. Attached hereto as Exhibit G is a true and correct copy of a June 30, 2025 email from Attorney May La Rosa to Attorney Erin Steelman.

10. Attached hereto as Exhibit H is a true and correct copy of a July 31, 2025 letter from Attorney May La Rosa to Attorney Erin Steelman.

11. Attached hereto as Exhibit I is a true and correct copy of Defendants' Answer to Plaintiff's First Request for Production dated January 10, 2025.

12. Attached hereto as Exhibit J is a true and correct copy of Paragon's Second Set of Interrogatories to Defendants dated December 13, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 6th day of August, 2025.

s/ Erin E. Steelman
Erin Steelman, (TN Bar No. 038463)